

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ANAS ELHADY, <i>et al.</i>,)	
)	
Plaintiffs,)	Case No. 16-cv-00375
v.)	Hon. Anthony J. Trenga
)	
CHARLES H. KABLE,)	
)	
Defendants.)	

**PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR EXTENSION OF TIME TO
CONDUCT ONE DEPOSITION**

The plaintiffs file this partial opposition to emphasize to the Court that, while they are not opposed to doing the TSC 30(b)(6) deposition on March 1, 2018, a broader discovery extension to allow the remaining 30(b)(6) depositions to occur in March will likely result in less motion practice between the parties, less conflict between the attorneys managing this discovery process, and it will allow Plaintiffs' legal team to fully prepare for those depositions and conduct them as a team rather than split up CAIR's limited attorneys between defending plaintiff depositions and taking defendant depositions. A general extension of discovery will also provide the parties with flexibility to undertake three plaintiff depositions that remain contested in some way.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court extend discovery for five weeks.

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS

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*Gadeir Abbas is licensed in VA, not in D.C.
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Dated: February 14, 2018

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2018, I electronically filed the foregoing by using the Court's ECF system. I further certify that all participants in the case are registered ECF users and will be electronically served by the Court's ECF notification system.

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS

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Dated: February 14, 2018